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REMARKS

In response to the Office Action mailed on January 31, 2006, Applicant(s) respectfully request(s) reconsideration.

Claim(s) 1,5-7, 9, 11-15 and 23-30 are pending in this Application.

In this Amendment, claim(s) 23-27 and 30 have been amended, claims 7 and 29 have been cancelled and claim(s) 31-34 have been added.

Of these, Claim(s) 23 & 31 are independent claims and the remaining claims are dependent claims.

Applicant(s) believe that the claim(s) as presented are in condition for allowance. A notice to this affect is respectfully requested.

Claims 23-30 have been rejected under 35 U.S.C. §101 as directed to non-statutory subject matter. In response, Claim 23 has been amended to recite a predetermined sequence of instructions tangibly embodied on an instruction medium executable by a processor responsive to the instructions. Claims 24 and 27 have been amended to recite that the processing occurs "according to application instructions." Accordingly, the rejection under 35 U.S.C. §101 is deemed to be overcome and it is respectfully requested that it be withdrawn in view of these amendments.

Claims 23 and 24 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,940,870 to Hamlin (Hamlin '870). Applicants respectfully disagree with these contentions and assert that the present claimed invention is not anticipated by any disclosure in the Hamlin '870 reference.

Hamlin teaches message routing to a variety of different applications using a "standard" or generic format. The Office Action seems to characterize the application selection and message passing of Hamlin as anticipatory of the order message processing in the present claims. However, Hamlin is distinctly different from the invention recited in claim 23 because Hamlin performs a conversion (2:43-48) to multiple destination applications by copying the data (2:65-67). The present claims neither perform nor require a conversion, but rather direct the message based on a type to a particular message processing

module. The order message manager need not perform and conversion or replication in order to dispatch multiple applications, as in Hamlin '870. The present invention, in claim 23, parses an order type embedded in the message to determine a message type, while Hamlin discloses looking up a transaction type in a database, and logging an error if none is found (7:34-40). Therefore, the present invention employs an embedded message type 64-1 along with each embedded input data set 44-1, as disclosed at page 14:10-14. The embedded transaction type is extracted from the message, not referenced via a database lookup. The subject matter of claim 29, reciting "parsing according to the predetermined format to identify tagged attributes indicative of the message types," and "indexing a mapping of order types to order processing modules" has been incorporated into claim 23 to further clarify and distinguish the present invention. Hamlin does not show, teach, or disclose, alone or in combination, such parsing according to the predetermined format to identify tagged attributes indicative of the order types. The parsed order type results in the extracted message type, parsed according to the predetermined format, as disclosed at page 14, lines 10-14.

Rather, Hamlin discloses employing a database lookup to identify a transaction type, as disclosed at Col. 7, lines 34-38. Further, Hamlin performs such a lookup after packing the transport data at blocks 144, 146. Therefore, Hamlin commences processing at blocks 144, 146 BEFORE identifying the transaction type. In contrast, the order message manager employs the claimed parsed order type for selectively invoking a message processing module based on the parsed type, thus performing processing AFTER identifying the order type, as discussed at page 10, lines 21-26.

Claims 25-30 have been rejected under 35 U.S.C. §103(a) as being obvious in view of Hamlin '870. The Office Action suggests that employing a widely known standard such as XML would be apparent to those of skill in the art. However, for the reasons discussed below, Hamlin does not show, teach, or disclose, alone or in combination, the claimed order processing, and further, if

one were to attempt to modify Hamlin to arrive at the present invention the result would be inoperable.

The cited Hamlin '870 system receives the message as a general transport and replication agent operable for replicating copies of the message and transporting the message to a plurality of different recipients, as disclosed at col. 2, lines 65-67. In this manner, Hamlin is operating as a general message server/router, not as an order server as claimed by the present application.

Further, Hamlin requires conversion of the message to conform to each of the variety of different recipients. The present system is only concerned with the particular specific order, hence need not perform conversion suited to different recipients. While a number of order processing modules are available, the present claims recite "directing the message to a particular order processing module based on the order type." Further, the claimed invention employs the type to invoke a particular message processing module 40 based on the type. In contrast, the Hamlin system replicates messages to multiple recipients, each corresponding to a particular application, as disclosed at page 2, lines 65-67 and again at page 7, lines 55-58. Therefore, processing according to Hamlin includes replicating and routing to a destination recipient list, not processing an individual order transaction between an orderer and a supplier. Multiple invocations using replicated, converted messages as disclosed in Hamlin would result in duplicate processing of the same order, thus rendering the result inoperable. Accordingly, claim 31 has been herein added, including the subject matter of claims claim 23-30, to further clarify and distinguish applicant's claimed invention.

Further, claim 31 recites the claimed distinguishing feature of Applicant's usage markup language. Hamlin makes no showing, teaching or disclosure of a markup language as employed in the claimed order processing. Rather, Hamlin discusses determining whether the data is received in a generic format or according to a particular set of semantics, as discussed at col. 7, lines 3-9. The standard, or generic format taught by Hamlin allows for a single conversion of the original message in a source format into the "generic format" receivable by a

variety of recipients, as disclosed at col. 6, lines 52-57. The present claims neither recite nor require conversion. Rather, the invention recited by the present claims invokes particular processing modules based on a type, and provides the corresponding order message. No conversion of the corresponding order message is performed based on, or prior to, invoking the particular processing module.

Markup processing employs parsing a scripted language according to predetermined rules, and does not include conversion of message formats from one format to another. The present invention employs markup processing for invoking processing modules for processing order data parsed from the order messages in markup form. No conversion is performed or required, and if such conversion were to be performed or required than the processing departs from markup language processing.

As indicated above, the present invention parses the tagged attributes, and obtains an extracted version of the order type, as disclosed at page 15, lines 14-21. To further clarify, the parsed tagged attribute, in the exemplary configuration, is a markup language tag from a markup language (which may be, but is not required to be, XML) which yields the extracted order type. This distinction is further clarified in added claim 31, which recited the subject matter of claim 29 in independent form, including subject matter of claims 23-29, and further recites language similar to claim 30 with respect to a markup document.

Claims 32-34 have been herein added, to further clarify and distinguish particular features of Applicant's claimed invention. Hamlin performs routing and transport to multiple destinations, as Hamlin performs "only a single conversion of all outbound data transmissions regardless of the variety of data destinations and only a single conversion of all inbound data transmissions regardless of the variety of data sources" (col. 2, lines 45-48).

As the remaining claims depend, either directly or indirectly, from claim 23, it is respectfully submitted that all claims in the case are in condition for allowance. Applicants hereby petition for any extension of time which is required

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to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,



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